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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PATRICIA SOMERS, as trustee for the Valesco
Irrevocable Trust dated June 16, 2004,

Plaintiff,

v.

MIDLAND NATIONAL LIFE INSURANCE
COMPANY,

Defendant.

Case No. 2:22-cv-1904-APG-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE REPLY
TO MIDLAND NATIONAL'S RESPONSE
TO PLAINTIFF'S MOTION FOR
REMAND (ECF NO. 20)**

(FIRST REQUEST)

Patricia Somers, trustee for the Valesco Irrevocable Trust dated June 16, 2004 ("Trustee"), by and through her counsel of record, the law firm of Lee Kiefer & Park, LLP, and Midland National Life Insurance Company ("Midland"), by and through its counsel of record, the law firm of Holley Driggs, hereby stipulate and agree as follows:

1. On January 9, 2023, Midland filed its Response to Plaintiff's Motion for Remand (ECF No. 20) ("Midland's Response").
2. The current deadline for the Trustee to file her Reply to Midland's Response is January 16, 2023 (the "Reply Deadline").
3. Trustee's counsel is scheduled for a two (2) day mediation out of the jurisdiction that they are currently preparing for, which is set to take place starting on the Reply Deadline.

4. Given the complexity of issues presented in the Motion to Remand, Midland's Response and the Trustee's counsel's scheduling conflicts, the parties agreed that a two-week extension of the Reply Deadline is appropriate.

5. Accordingly, the parties stipulate and agree that the Reply Deadline shall be extended to January 31, 2023. This is the parties' first request for an extension of this deadline, and such request is not meant for the purpose of causing undue delay.

IT IS SO STIPULATED.

DATED this 12th day of January 2023.

HOLLEY DRIGGS

/s/ Jessica M. Lujan

F. THOMAS EDWARDS, ESQ.

Nevada Bar No. 9549

JESSICA M. LUJAN, ESQ.

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300 South Fourth Street, Suite 1600

Las Vegas, Nevada 89101

*Attorneys for Defendant Midland National
Life Insurance Company*

DATED this 12th day of January 2023.

LEE KIEFER & PARK, LLP

/s/ Matthew W. Park

MATTHEW W. PARK, ESQ.

Nevada Bar No. 12062

T. CHASE PITTSBARGER

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Las Vegas, Nevada 89144

*Attorneys for Plaintiff, Patricia Somers,
Trustee*

ORDER

IT IS SO ORDERED.

Dated: January 13, 2023



UNITED STATES DISTRICT JUDGE